## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF CASE NO. 19-01722-MCF

JOSE LUIS CORREA GONZALEZ XXX-XX-3630 DEBTOR(S)

**CHAPTER 13** 

**ASSET CASE** 

# REPLY TO TRUSTEE'S OBJECTION TO PROPOSED POST CONFIRMATION PLAN MODIFICATION UNDER SECTION 1329

#### TO THE HONORABLE COURT

**NOW COMES**, Debtor through the undersigned attorney and very respectfully states and prays as follows:

- 1. The plan is sufficiently funded to pay in full the priority claim to ASUME thru the plan. See plan sections 2.1, 8.3 and 8.5.
- 2. Debtor has evidenced that he is paying part of the arrears claimed by ASUME directly from the Social Security Administration. See exhibits to docket 55 petitioner's bank statements and petitioner's ASUME online certification. See also paragraph 2 lines 8 thru 11 at docket 59. Debtor has submitted evidence of the payments made to ASUME.
- 3. Debtor need not consider requesting the amendment to ASUME'S claim. The monthly payments to ASUME by the Social Security Administration have been and will continue to be recurrent.
- 4. Debtor has already considered that the plan "shall provide for the full payment, in deferred cash payments, of all claims entitled to priority under section 507 of this title, unless the holder of a particular claim agrees to a different treatment of such claim". See paragraph 4 lines 7 to end at docket 59.
- 5. The certification from ASUME has already been submitted. See exhibit to docket 55.

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**WHEREFORE**, for the above stated reasons it is respectfully requested from this Honorable Court approve Debtor's post confirmation modified plan dated 8/17/2020.

I HEREBY CERTIFY: that a copy of this motion was electronically filed by debtor using the CM/ECF System which will send a notification to the standing Chapter 13 Trustee and to all registered interested parties. In addition, a copy of this motion was sent by debtor's attorney to the debtor at the address of record and to all creditors and parties in interest appearing in the master address list not registered in CM/ECF.

RESPECTFULLY SUBMITTED IN CAROLINA, PUERTO RICO, OCTOBER 21, 2020.

/s/ Ramón F. López
RAMON F. LOPEZ, ESQ. (203813)
RAMON F. LOPEZ LAW OFFICES, P.S.C.
ATTORNEY FOR THE ABOVE NAMED DEBTOR
PO BOX 34173
FT BUCHANAN PR 00934
PHONE (787) 276-0196
ramonlopezlaw@gmail.com



Fecha de emisión: 10/20/2020

Issue date:

#### **HISTORIAL DE PAGOS DE PENSION**

Child Support Payment History

Número de caso: 0257218

Case number:

Persona custodia: MARIBEL GARCIA BARRETO Persona no custodia: JOSE CORREA GONZALEZ

Custodial person: Non custodial person:

 Balance:
 \$42,088.31
 Pensión:
 \$0.00
 Frecuencia:

 Arrears due:
 Support Established:
 Payment frequency:

Fecha de pago	Cantidad del pago	Número de transacción Transaction number		
Payment date	Payment amount			
10/5/2020	\$1,188.00	030300811		
10/2/2020	\$621.60	030288354		
9/3/2020	\$621.60	030152320		
9/3/2020	\$400.00	030152320		
8/5/2020	\$540.00	030012484		
8/3/2020	\$621.60	029996498		
7/3/2020	\$541.20	029865869		
7/2/2020	\$621.60	029856588		
6/3/2020	\$621.60	029691614		

El historial de pagos de pensión alimentaria solo abarca los pagos realizados durante los últimos 18 meses. Este documento contiene información del sistema mecanizado (PRACSES) de la Administración para el Sustento de Menores. Los pagos realizados directamente a la Persona Custodia no se registran. En aquellos casos en los que la familia recibe o recibió asistencia económica, la cantidad del pago responde al dinero distribuido luego del ajuste correspondiente por concepto de los beneficios recibidos. El número de transacción 0 corresponde a pagos recibidos, pero no distribuidos por razones reglamentarias. De usted identificar discrepancias en la información obtenida a través de este medio, tiene el deber de comunicarse o acudir a la oficina local correspondiente de la ASUME con el propósito de aclarar la misma. "R" significa reembolso al pagador.

This Child support payment history only shows payments made during the last 18 months. This document contains information from the Administration for Child Support Enforcement automated system (PRACSES). Payments made directly to the Custodial Person are not registered. In cases where the family receives or received TANF payments, the payment amount means money distributed after the corresponding adjustment was made for benefits received. Transaction number 0 means an undistributed collection due to regulatory reasons. If you identify any discrepancies with the information displayed in our page, please contact or visit your corresponding ASUME local office for clarification. "R" means reimbursement to the payor.



Fecha de emisión: 10/20/2020

Issue date:

#### **HISTORIAL DE PAGOS DE PENSION**

Child Support Payment History

Fecha de pago	Cantidad del pago	Número de transacción		
Payment date	Payment amount	Transaction number		
5/1/2020	\$621.60	029534324		
4/3/2020	\$621.60	029424009		
3/6/2020	\$1,212.70	029297768		
3/3/2020	\$621.60	029278414		
2/3/2020	\$621.60	029136706		
1/3/2020	\$621.60	028997826		
12/3/2019	\$616.20	028847809		
12/2/2019	\$255.79	028836388		
11/4/2019	\$255.79	028712220		
11/1/2019	\$616.20	028698990		
10/4/2019	\$255.79	028567504		
10/3/2019	\$616.20	028557451		
9/5/2019	\$255.79	028419801		
9/3/2019	\$616.20	028398412		
8/6/2019	\$255.79	028278123		

El historial de pagos de pensión alimentaria solo abarca los pagos realizados durante los últimos 18 meses. Este documento contiene información del sistema mecanizado (PRACSES) de la Administración para el Sustento de Menores. Los pagos realizados directamente a la Persona Custodía no se registran. En aquellos casos en los que la familia recibe o recibió asistencia económica, la cantidad del pago responde al dinero distribuido luego del ajuste correspondiente por concepto de los beneficios recibidos. El número de transacción 0 corresponde a pagos recibidos, pero no distribuidos por razones reglamentarias. De usted identificar discrepancias en la información obtenida a través de este medio, tiene el deber de comunicarse o acudir a la oficina local correspondiente de la ASUME con el propósito de aclarar la misma. "R" significa reembolso al pagador.

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#### **HISTORIAL DE PAGOS DE PENSION**

Child Support Payment History				
Fecha de pago	Cantidad del pago	Número de transacción  Transaction number		
Payment date	Payment amount	Transaction number		
8/2/2019	\$616.20	028259671		
7/8/2019	\$255.79	028135139		
7/3/2019	\$616.20	028117263		
6/3/2019	\$255.79	027969438		
6/3/2019	\$616.20	027969438		
5/3/2019	\$616.20	027831192		
5/2/2019	\$855.79	027823714		

El historial de pagos de pensión alimentaria solo abarca los pagos realizados durante los últimos 18 meses. Este documento contiene información del sistema mecanizado (PRACSES) de la Administración para el Sustento de Menores. Los pagos realizados directamente a la Persona Custodia no se registran. En aquellos casos en los que la familia recibe o recibió asistencia económica, la cantidad del pago responde al dinero distribuido luego del ajuste correspondiente por concepto de los beneficios recibidos. El número de transacción 0 corresponde a pagos recibidos, pero no distribuidos por razones reglamentarias. De usted identificar discrepancias en la información obtenida a través de este medio, tiene el deber de comunicarse o acudir a la oficina local correspondiente de la ASUME con el propósito de aclarar la misma. "R" significa reembolso al pagador.

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## CERTIFICACION CERTIFICATE

Nuestro sistema mecanizado contiene la siguiente información:

Our automated case management system has the following information:

A JOSE L CORREA GONZALEZ se le estableció una orden de alimentos, mediante Sentencia, Orden o Resolución. JOSE L CORREA GONZALEZ has a child support order established through Judgment, Order or Decision.

Caso Case	Pensión Fijada Support Established	Frecuencia de Pago Payment Frequency	Fecha Último Pago Last Payment Date	Balance adeudado Arrears Due	Plan de Pagos Payment plan	Plan de Pagos Payment plan frequency	se estableció Plan de Pagos Payment Plan establishment date	pago registrado del Plan de Pagos Date of last payment for payment plan
0257218	\$0.00		10/5/2020	\$42,088.31				
En este caso los alimentistas NO recibieron asistencia económica del Programa Ayuda Temporal a Familias Necesitadas 'TANF'.  In this case, the obligees received NO economic assistance from the Temporary Assistance for Needy Families Program (TANF).  JOSE L CORREA GONZALEZ SI se encuentra acogido/a a la Ley de Quiebras.  JOSE L CORREA GONZALEZ IS under the protection of the Bankruptcy Act.								
Tiene 1 obligación(es) de pagos de pension(es) alimentaria(s) a través de ASUME.								
Has 1 child support obligation(s) through the ASUME								
Recibe pensión Receives child		a a través de ASUN gh ASUME in 0		caso(s):				

Este documento resume la información contenida en el sistema mecanizado (PRACSES) de la Administración para el Sustento de Menores. Los pagos realizados directamente a la persona custodía no se registran como pagos de pensión alimentaria ni plan de pago. Deberá acudir a la oficina de la ASUME donde está asignado su caso para solicitar la acreditación de pagos efectuados fuera de ASUME. El balance de esta Certificación no incluye el mes en que fue expedida. La información de este documento es válida por treinta (30) días, a partir de la fecha de su emisión.

This document summarizes the information contained in the Administration for Child Support Enforcement automated system (PRACSES). Payments made directly to the Custodial Person are neither registered as child support payments nor as payments made for the payment plan. You must visit the ASUME office to which your case is assigned in order to request to credit those payments. The balance in this Certificate does not include the current month when it was issued. The information contained in this document is valid for thirty (30) days from its issue date.

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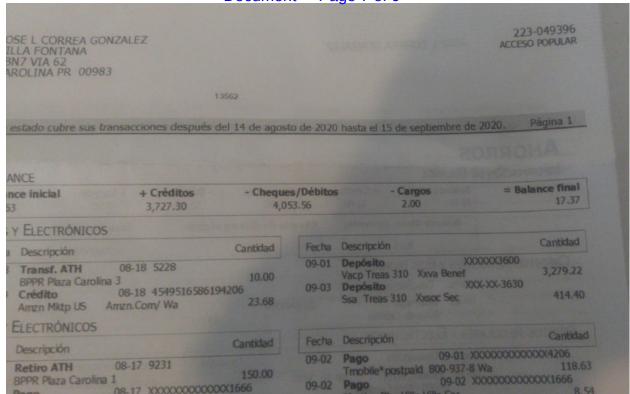
NOTA DE CONFIDENCIALIDAD: La información contenida en este documento y cualquier anejo del mismo es confidencial y privilegiada y tiene el propósito de que sólo sea utilizado por la persona identificada en el mismo.

CONFIDENTIALITY NOTE: The information contained in this document and any attachment is confidential and privileged and has the purpose of being used only by the person identified in it.

Para validar la información contenida en este certificado, favor acceder a http://www.pr.gov/validacionelectronica/.

To validate the information herein, please access http://www.pr.gov/validacionelectronica/.

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19-01722-MCF13 JOSE LUIS CORREA GONZALEZ

Case type: bk Chapter: 13 Asset: Yes Vol: v US BANKRUPTCY

**JUDGE: MILDRED CABAN FLORES** 

**Date filed:** 03/29/2019 **Date of last filing:** 10/11/2020 **Plan confirmed:** 01/27/2020

### **Creditors**

AR RESOURCES PO Box 1056 Blue Bell, PA 19422	(4700823) (cr)
ASUME PO BOX 70376 San Juan, PR 00936	(4700824) (cr)
<b>ASUME-MARIBEL GARCIA BARRETO</b> PO BOX 71316 SAN JUAN PR 00936-8416	(4718640) (cr)
BANCO POPULAR DE PUERTO RICO BANKRUPTCY DEPARTMENT PO BOX 366818 SAN JUAN PR 00936-6818	(4705429) (cr)
BANCO SANTANDER PO BOX 362589 San Juan, PR 00936-2589	(4700825) (cr)
BANCO SANTANDER PO BOX 362589 San Juan, PR 00936-2589	(4700826) (cr)
BANK OF AMERICA PO BOX 982238 El Paso, TX 79998-2235	(4700827) (cr)
CARLOS LOZADA URB. VILLA CAROLINA AVE. SANCHEZ OSORIO	(4700828) (cr)
CARMEN L. DIAZ MARRERO URB. VILLA FONTANA VIA 62 3BN7 Carolina, PR 00983	(4700829) (cr)
CLARO PO BOX 70367 San Juan, PR 00936-8367	(4700830) (cr)
CMRE	(4700831)

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3075 IMPERIAL HWY (cr) **SUITE 200** 

Brea, CA 92821

COX

(4700832)P.O. Box 78071 (cr)

Phoenix, AZ 85062-8071

**HOME DEPOT** 

(4700833)PO BOX 9001010

(cr)

Louisville, KY 40290-1010

**NAVY FEDERAL CREDIT UNION** 

(4700834)PO BOX 3000

(cr) Merrifield, VA 22119-3000

**Oriental Bank** 

Retail Operation & Collections (4705063)

Box 364745, (cr)

San Juan, P.R. 00936-4745 Att.: Ramn A. Snchez Marrero

PROGRESSIVE MANAGMENT SYSTEM

(4700835)1521 WEST CAMERON AVENUE (cr)

West Covina, CA 91790

PYOD, LLC

Resurgent Capital Services (4724628)

PO Box 19008 (cr)

Greenville, SC 29602

**T-MOBILE** 

654 AVE MUNOZ RIVERA (4700836)

SUITE 2 (cr)

San Juan, PR 00918

WANDA I RODRIGUEZ DE JESUS

(4709365) 1131 AVE JESUS T PINERO (cr)

SAN JUAN PR 00920